



3960 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169

TYSON & MENDES LLP
THOMAS E. MCGRATH
Nevada Bar No. 7086
Email: tmcgrath@tysonmendes.com
CHRISTOPHER A. LUND
Nevada Bar No. 12435
Email: clund@tysonmendes.com
3960 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169
Tel: (702) 724-2648
Fax: (702) 938-1048
*Attorneys for Defendant Canyon Hills
Landscaping Maintenance Association, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

WELLS FARGO BANK, N.A., AS TRUSTEE
FOR THE POOLING AND SERVICING
AGREEMENT DATED AS OF AUGUST 1,
2005 PARK PLACE SECURITIES, INC.
ASSET-BACKED PASS-THROUGH
CERTIFICATES SERIES 2005-WHQ4,

Plaintiff,

vs.

FIRST 100, LLC; BRADLEY L. FOOTE;
STEPHEN B. KEHRES; CANYON HILLS
LANDSCAPING MAINTENANCE
ASSOCIATION, INC.,

Defendants.

BRADLEY L. FOOTE; STEPHEN B. KEHRES.

Counterclaimant,

vs.

WELLS FARGO BANK, N.A., AS TRUSTEE
FOR THE POOLING AND SERVICING
AGREEMENT DATED AS OF AUGUST 1,
2005 PARK PLACE SECURITIES, INC.
ASSET-BACKED PASS-THROUGH
CERTIFICATES SERIES 2005-WHQ4,

Counterdefendant.

BRADLEY L. FOOTE; STEPHEN B. KEHRES,

Third-Party Plaintiffs,

Case No. 3:17-cv-00062-MMD-WGC

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
FOR CANYON HILLS LANDSCAPING
MAINTENANCE ASSOCIATION, INC.
TO FILE RESPONSE TO WELLS FARGO
BANK, N.A.'S MOTION FOR SUMMARY
JUDGMENT [ECF No. 50]**

(First Request)

1 vs.

2 OMNI FINANCIAL, LLC, a California limited
3 liability company; and COLGAN FINANCIAL
4 GROUP, INC., a Connecticut corporation,

Third-Party Defendants.

5 Defendant Canyon Hills Landscaping Maintenance Association, Inc. (“Canyon Hills”)
6 and plaintiff/counter-defendant Wells Fargo Bank, N.A., as Trustee for the Pooling and
7 Servicing Agreement Dated as of August 1, 2005 Park Place Securities, Inc. Asset-Backed Pass-
8 Through Certificates Series 2005-WHQ4 (“Wells Fargo”) (collectively, the “Parties”), by and
9 through their undersigned counsels of record, hereby stipulate and agree to an extension of time
10 for Canyon Hills to file a response to Wells Fargo’s Motion for Summary Judgment [ECF No.
11 50] (the “Motion”), filed on May 29, 2018, as follows:

12 1. The last day for Canyon Hills to file a Response to the Motion is June 19, 2018.

13 2. Counsel for Canyon Hills is traveling outside the country until July 2, 2018, and
14 will have limited access to the internet and files necessary to prepare a response to the Motion.

15 3. There is currently no hearing on the Motion scheduled in this matter.

16 4. This is the Parties’ first request for an extension of time to file a response to Wells
17 Fargo’s Motion.

18 5. The Parties respectfully submit that good cause exists for such extension and that
19 this request is not brought for any improper purpose or for purposes of delay.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

6. Pursuant to LR IA 6-1, and subject to the approval of the Court, the Parties stipulate and agree that Canyon Hills shall have up to and until July 6, 2018 to file a response to the Motion.

DATED this 19th day of June, 2018.

DATED this 19th day of June, 2018.

WRIGHT, FINLAY & ZAK, LLP

TYSON & MENDES LLP

/s/ Krista J. Nielson

CHRISTINA V. MILLER

Nevada Bar No. 12448

KRISTA J. NIELSON

Nevada Bar No. 10698

7785 West Sahara Avenue, Suite 200

Las Vegas, NV 89117

Tel: (702) 475-7964

Attorneys for Plaintiff Wells Fargo Bank, N.A.

/s/ Christopher A. Lund

THOMAS E. MCGRATH

Nevada Bar No. 7086

CHRISTOPHER A. LUND

Nevada Bar No. 12435

3960 Howard Hughes Parkway, Suite 600

Las Vegas, Nevada 89169

Tel: (702) 724-2648

*Attorneys for Defendant Canyon Hills
Landscaping Maintenance Association, Inc.*

ORDER

Based on the foregoing stipulation, and good cause appearing,

IT IS HEREBY ORDERED that defendant Canyon Hills Landscaping Maintenance Association, Inc. shall have up to and until July 6, 2018 to file a response to Wells Fargo Bank, N.A.'s Motion for Summary Judgment [ECF No. 50].

IT IS SO ORDERED.

DATED this 20th day of June, 2018.



UNITED STATES DISTRICT JUDGE